HUD-VASH Reference Guide - Requirements

Summary of requirements in PIH Notices and the Federal Register notice,
Revised Implementation of the HUD-VA Supportive Housing Program, published March 23, 2012.

Topic	HUD-VASH Operating Requirements
PHA Eligibility	Eligible PHAs must be located within the jurisdiction of a VAMC and in an area of high need based up on data compiled by HUD and the VA. PHA administrative performance also is taken into consideration.
	When Congress funds a new allocation of HUD-VASH vouchers, HUD invites eligible PHAs to apply for a specified number of vouchers. Only those PHAs invited to apply receive HUD-VASH vouchers.
Participant Eligibility	Eligible families are homeless Veterans and their families that are referred to participating PHAs by the PHAs' partnering VAMCs or CBOCs. Before making referrals to PHAs, VA staff screen families according to the VA's screening criteria and in compliance with federal nondiscrimination and civil rights laws. *See* 24 CFR 5.105(a) and 24 CFR 982.53.
	DD-214 certificates and VA-verified Applications for Health Benefits must be accepted as verification of SSNs and birthdates. VA identification cards must be accepted as government-issued photo identification, and they can also verify SSNs and birthdates.
	PHAs screen only for income eligibility and lifetime registration under state sex offender registration programs. However, when new family members are added after the Veteran is a participant, 24 CFR 982.551(h)(2) and regular PHA screening criteria apply.
	The income targeting requirement of 75% of families being extremely low-income does not apply to HUD-VASH.
HQS Inspections	PHAs may pre-inspect units that Veterans may be interested in leasing. If a family selects a unit that passed a HQS inspection (without intervening occupancy) within 45 days of the date of the Request for Tenancy Approval, the unit may be approved.
Leasing	Families issued a HUD-VASH voucher have at least 120 days to search for a unit.
	Families issued a HUD-VASH voucher may move under portability, even if the family did not have legal residency in the jurisdiction of the initial PHA when they applied.
	HUD-VASH families may enter into an initial lease with an owner for less than 12 months.
	HUD-VASH families may live on the grounds of a VAMC in units owned by the VA.
Case Management	Veterans must agree to participate in case management in order to receive a HUD-VASH voucher. HUD-VASH assistance may be terminated if the family refuses, without good cause, to participate in required case management as verified by the VAMC
	A VAMC's determination that case management is no longer needed is not grounds for termination of HCV assistance. In such cases, a family may be offered a regular voucher to free up the HUD-VASH voucher, or they may keep their HUD-VASH voucher.
Portability - within initial VAMC's catchment area	A HUD-VASH family can move within the VAMC's catchment area as long as case management can still be provided, as determined by the VA. The VA must always be consulted prior to a move to ensure that case management will continue to be provided.
	If the receiving PHA does not have a HUD-VASH program, they must bill the initial PHA. If the receiving PHA does have a HUD-VASH program, they may absorb the family or bill the initial PHA.
Portability - outside initial VAMC's catchment area	A HUD-VASH family can move if the referring VAMC confirms that the new VAMC has an available case management slot.
	The receiving PHA must have a HUD-VASH program and the HUD-VASH family must be absorbed.
Portability - when case management no longer required	If a HUD-VASH family wishes to move under portability and the Veteran no longer requires case management, they do not need to move to a community in which case management can be provided. The receiving PHA does not need to be a HUD-VASH PHA, and they may choose to bill the initial PHA or absorb the Veteran with a regular voucher. If they choose to bill the initial PHA, they must enter/maintain "VASH" on line 2n of form HUD-50058.
Voucher Turnover	Upon turnover, HUD-VASH vouchers must be issued to eligible Veteran families as identified by VAMCs.
PBVs - see Notice PIH 2011-50	HUD will consider, on a case-by-case basis, requests from participating PHAs to project-base HUD-VASH vouchers.
	HUD has lifted the limit on the percent of a PHA's HUD-VASH allocation that could be project-based. However, HUD-VASH project-based units are still counted under the 20-percent budget authority limit, in accordance with 24 CFR 983.5(a).
SEMAP	HUD-VASH vouchers are excluded from the SEMAP leasing indicator.
Moving to Work	HUD-VASH vouchers must be administered in accordance with HUD-VASH notices and are not eligible for fungibility. An MTW agency may submit a request to the Office of Public Housing and Voucher Programs to operate HUD-VASH vouchers in accordance with their MTW administrative flexibilities. The request will be approved if the flexibilities do not conflict with VASH requirements.
	HUD-VASH vouchers must be reported on separately from MTW vouchers using the regular form HUD-50058, unless an MTW agency requests and is granted a waiver by HUD headquarters.
Topic	**HUD-VASH Reporting Requirements** - See Notice PIH 2011-53
New PIC Code	The code "VASH" has been established for use on line 2n of HUD-50058 to indicate that the family is a participant. The code must remain on the form throughout the family's participation in the program.
	PHAs must report issuance on HUD-50058 by entering VASH in field 2n and code 10 (issuance of voucher) in field 2a.
	If a HUD-VASH family no longer requires case management and the PHA has the funding and elects to serve them under its regular HCV program, the VASH code is no longer used on 2n. If the PHA elects not to provide them with a regular voucher, the VASH code must continue to be used on 2n.
PIC and Portability	If the HUD-VASH family never leased up in the initial PHA's jurisdiction, the receiving PHA must enter code 1 (new admission) on line 2a. If the HUD-VASH family did lease up in the initial PHA's jurisdiction, the receiving PHA must enter code 4 (port-in) on 2a.
	The receiving PHA must submit a 50058 report in PIC for action code 10 (issuance of voucher) on line 2a. Receiving PHAs that have not been awarded VASH vouchers must bill the initial PHA for tracking purposes.
	The code VASH must be entered and maintained on line 2n by both the initial and receiving PHA.
VMS	In VMS, the PHA should report all families that are supported by HAP funds under its own ACC, including those for which it is billed under portability.
	The UML and HAP of a HUD-VASH voucher that has ported out (for which the PHA is being billed) should be reported in the VASH field, not the port-out field.

HUD-VASH Reference Guide – Rules waived for the program (based on flexibility provided by Congress in annual appropriations acts)

Topic	Regulation/Legislation	Explanation of Regulation/Authorization	HUD-VASH Requirement
Eligibility	Section 8(o)(19) of USHA of 1937	A provision of this statute requires that homeless Veterans have a chronic mental illness or chronic substance use disorder and that such disorders be treated as a condition of receipt of HUD-VASH voucher.	HUD-VASH participants are not required to have or be treated for chronic mental illnesses or chronic substance abuse disorders.
Waiting Lists	Section 8(o)(6)(A) of USHA of 1937, U.S.C. 1437f(o)(6)(A)	Authorizes PHAs to establish preferences for their waiting list based upon local need and priorities.	PHAs do not have the authority to maintain a waiting list or apply local preferences for HUD-VASH vouchers.
	24 CFR 982.202 through 982.206	Covers selection of applicants, special admissions, waiting list administration, cross-listing, and opening/closing of waiting lists.	PHAs do not have the authority to maintain a waiting list or apply local preferences for HUD-VASH vouchers.
Preferences	24 CFR 982.207	Covers local preferences.	PHAs do not have the authority to maintain a waiting list or apply local preferences for HUD-VASH vouchers.
Screening of Applicants	24 CFR 982.552 and 24 CFR 982.553	PHAs have the authority to screen potentially eligible families and deny assistance on permitted grounds. 982.552 covers broad denial for violations of HCV program requirements and 982.553 covers specific denials for criminal and alcohol abusers.	PHAs do not have authority to determine family eligibility in accordance with HCV program rules and PHA policies. The VAMC will screen families in accordance with its screening criteria and federal nondiscrimination laws. One exception is that 982.553(a)(2)(i) is not waived & requires denial of admission to certain registered sex offenders. Also, when new family members are added after the Veteran is a participant, 24 CFR 982.551(h)(2) and regular PHA screening criteria apply.
Income Targeting	24 CFR 982.201(b)(2) and income targeting requirements of Section 16(b) of USHA of 1937	Specifies income-targeting requirements for PHAs: no less than 75% of families admitted to the voucher program must be extremely low-income families.	To ensure that PHAs can effectively serve the eligible population specified in the Conference Report accompanying the 2008 Appropriations Act, homeless Veterans at a range of income levels, income-targeting requirements do not apply for HUD-VASH.
Initial Search Term	24 CFR 982.303(a)	Sets an initial search term of at least 60 calendar days for participants to locate housing using their voucher.	In recognition of the potential challenges associated with locating appropriate housing, the initial search term for HUD-VASH participants must be at least 120 days. Any extensions, suspensions, and progress reports will remain under the policies in PHA's admin plan but will apply after the 120-day initial search term.
Length of Lease	Section 8(o)(7)(A) of the USHA of 1937, 42 USC 1437(f)(o)(7)(A), and 24 CFR 982.309(a)(2)(ii)	Requires that the initial lease with the owner be for 1 year unless a shorter term would improve housing opportunities for the tenant and the shorter term is a prevailing market practice.	Initial lease terms may be less than 1 year in order to provide a greater range of housing opportunities for HUD-VASH voucher holders.
Location of Units	24 CFR 982.352(a)(5)	Prohibits the use of vouchers for units on the grounds of medical, mental, or similar public or private institutions	HUD-VASH families are permitted to live on the grounds of a VAMC in units developed to house homeless Veterans.
Mobility & Portability	24 CFR 982.353(a), (b), and (c)	Covers where the family can lease a unit with HCV assistance. Stipulates that applicant families are allowed to move under portability upon voucher issuance, prior to being officially admitted into the program. PHAs may restrict portability if neither the household head nor spouse of an applicant family were legal residents in the jurisdiction of the initial PHA when they applied.	PHAs must follow special mobility and portability procedures for HUD-VASH. All Veteran families still have the right to move under portability, as long as partnering VAMC(s) approve and can continue to provide case management, if it's still needed by the Veteran. Families issued a HUD-VASH voucher that were not legal residents when they applied must be allowed to move under portability. See Notice PIH 2011-53 for more information.
Portability	Section 8(l)(B)(i) of the USHA of 1937; 42 U.S.C. 1437 f(r)(l)(B)(i)	Restricts portability in cases where the family did not reside in the jurisdiction of the PHA at the time of the HCV application	HUD-VASH PHAs have to follow special mobility and portability procedures. Families issued a HUD-VASH voucher that were not legal residents when they applied must be allowed to move under portability.
	24 CFR 982.3559(d)	Provides the option for the receiving PHA to absorb the family into its own HCV program or to bill the initial PHA instead	HUD-VASH PHAs have to follow special mobility and portability procedures. See Notice PIH 2011-53 for more information.
SEMAP	24 CFR 985.3(n)(l)(i) and (ii)	Covers procedures for verifying the lease-up indicator in SEMAP	Because the leasing of HUD-VASH vouchers will be dependent on referrals from the VAMC, the unit months and budget authority associated with these vouchers will not be included in the SEMAP leasing indicator denominator. However, utilization of these vouchers will be monitored separately through HUD systems.